

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

RANDY LUNDY,

Plaintiff,

v.

HL MOTOR GROUP, INC., HIGHLIGHT  
MOTOR FREIGHT USA, INC., OLD  
REPUBLIC INSURANCE COMPANY,  
AND OGNJEN MILANOVIC,

Defendants.

Case No.: CIV-22-699-F

FARMERS MUTUAL FIRE INSURANCE  
COMPANY OF OKARCHE,

Plaintiff,

v.

HL MOTOR GROUP, INC. and OGNJEN  
MILANOVIC,

Defendants.

Case No.: CIV-22-752-F

**PLAINTIFF RANDY LUNDY'S TRIAL WITNESS LIST**

NO.	NAME/ADDRESS	PROPOSED TESTIMONY
1.	Randy Lundy c/o Stewart Law Firm 801 N.W. 63 <sup>rd</sup> Street, Suite 100 Oklahoma City, OK 73116	Loss facts, verification of damages (to the extent necessary in light stipulation and agreement regarding damages).
2.	Alexander Saitov c/o Lewis, Brisbois, Bisgaard & Smith, LLP 550 W. Adams Street, Suite 300 Chicago, IL 60661	If witness appears live: Topics addressed in deposition including but not limited to: role and responsibilities at company; Milanovic's employment history with Defendant; Defendant's investigation of accident; driver log details; Defendant's knowledge of driver dehydration; liability defenses asserted.

		If witness does not appear live: Plaintiff to call witness via deposition (transcript and/or video)
3.	Ognjen Milanovic c/o Lewis, Brisbois, Bisgaard & Smith, LLP 550 W. Adams Street, Suite 300 Chicago, IL 60661	If witness appears live: Topics addressed in deposition including but not limited to driver's employment with Defendant; trip details; accident details; post-accident details and medical treatment.  If witness does not appear live: Plaintiff to call witness via deposition (transcript and/or video).
4.	Trooper Wayne Linzy Oklahoma Highway Patrol 3600 N. Martin Luther King Ave. Oklahoma City, OK 73111	Investigation of accident; Report details; observations of scene, property, truck and driver; experience with crashes involving sleepy drivers vs. drivers with medical conditions.
5.	All witnesses listed by any other party not objected to by this Plaintiff.	
6.	Plaintiff reserves the right to list additional witnesses as discovery progresses and based on witnesses listed by other parties.	

Respectfully submitted,

/s/ Rodney D. Stewart \_\_\_\_\_  
 Rodney D. Stewart  
 OBA #15105  
 Attorney for Plaintiff Randy Lundy  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 15, 2023, I transmitted the above to all counsel of record.

s/ Rodney D. Stewart  
Rodney D. Stewart